

*Exhibit C*

BROWNING, KALECZYC, BERRY & HOVEN, P.C.

ATTORNEYS AT LAW

28 NORTH LAST CHANCE GULCH

POST OFFICE BOX 1697

HELENA, MONTANA 59624

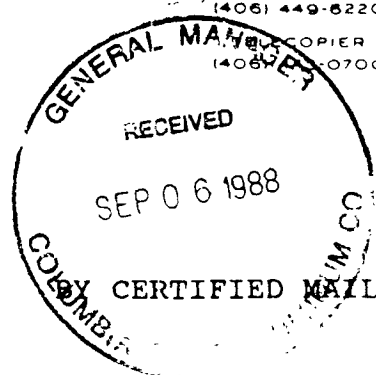
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STANLEY T KALECZYC\*  
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\*MEMBER OF MONTANA AND THE  
DISTRICT OF COLUMBIA BARS

TELEPHONE

(406) 449-6220

TELECOPIER  
(406) 449-0700



September 2, 1988

Mr. Charles E. Findley  
Director, Hazardous Waste Division  
U.S. Environmental Protection Agency  
Region 10  
1200 6th Avenue  
Seattle, WA 98101

Re: Response of Columbia Falls Aluminum Company to Request  
for Information Involving the ARRCOM Corporation,  
Rathdrum, Idaho

Dear Mr. Findley:

This letter is written in response to your notification of federal action and request for information concerning the above-referenced facility dated August 15, 1988. The purpose of this letter is two-fold: First, please be advised that Columbia Falls Aluminum Company (CFAC), the present operator of the aluminum reduction facility located at Columbia Falls, Montana has not been involved in the transportation of any substances to the ARRCOM site in Rathdrum, Idaho, since the acquisition of CFAC by Montana Aluminum Investors Corporation in September 1985. Second, by this letter I am transmitting to you on behalf of my client, CFAC, certain records located at the Columbia Falls corporate offices which were created and maintained by the prior owners and operators of the Columbia Falls Aluminum Reduction Facility and left at the plant's location by them at the time of the acquisition of the facility by present management. As explained more fully below, the documents have been photocopied and are enclosed for your reference.

Prior to September 1985, the aluminum reduction facility located at Columbia Falls, Montana, was owned by the Atlantic Richfield Company (ARCO) and its affiliated companies. In or about August 1985, the management of ARCO caused CFAC, a Montana corporation, to be created in order to facilitate the acquisition and sale of the aluminum reduction facility at Columbia Falls, Montana. These properties were acquired from ARCO by Montana Aluminum Investors Corporation (MAIC), as part of the acquisition by MAIC the stock of CFAC. Since September 1985, CFAC has not transported any substances to the ARRCOM Corporation site located

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in Rathdrum, Idaho. Accordingly, CFAC is neither a generator nor a transporter of materials to the Rathdrum, Idaho site. Based upon the foregoing, CFAC responds to your questions as follows:

1. Information concerning CFAC's non-involvement in the transportation of substances to Rathdrum, Idaho, was verified by Mr. Ken Reick, CFAC's Environmental Supervisor.
2. CFAC does not maintain any insurance policies for any damages resulting from hazardous wastes, hazardous substances, pollutants, or contaminants.
3. There were no shipments by CFAC of solid or liquid wastes, oils, sludges, caustics, acids, capacitor oils, transformer oils or other materials to the Rathdrum, Idaho Oil Recycling Facility from 1969 until January, 1982.
4. CFAC has no documents of the type identified in your information request number 4.
5. CFAC has no documents of the type identified in your information request number 5.
6. CFAC has no documents of the type identified in your information request number 6.
7. Insofar as CFAC did not transport or cause any such materials to be transported to the Rathdrum site, there are no employees who would have any knowledge concerning CFAC's activities.
8. Insofar as CFAC did not authorize any shipments of materials to the Rathdrum facility, there are no past or present employees of CFAC who would have made such authorizations.
9. CFAC is in the process of gathering information and documents reflecting its present financial status. When such documents have been gathered, they will be forwarded to you with an appropriate claim that such information should not be disclosed to the public since it constitutes proprietary and confidential business information. CFAC estimates that this information will be collected and made available to the EPA on or about September 15, 1988.

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10. CFAC is a wholly owned subsidiary of Montana Aluminum Investors Corporation, a Montana corporation.
11. Not applicable.
12. Not applicable.

As indicated previously in this letter and in my telephone conversations with Ms. Monica Kirk of your legal department, employees of CFAC have located certain documents which were prepared by or on behalf of the prior owner of the Columbia Falls Aluminum Reduction Facility, which documents relate to the transportation of certain materials from the Columbia Falls facility to Rathdrum, Idaho during the period in question. Copies of these materials are enclosed with this letter. With respect to your request for information, CFAC provides the following information with respect to the shipments (as in the case of the preceding answers, these answers correspond to the questions as posed in your letter dated August 15, 1988):

1. This information was developed by Mr. Kenneth Reick, Environmental Supervisor, CFAC.
2. CFAC is not aware what insurance policies, if any, may have been maintained or are currently maintained by ARCO or any of its affiliates which might apply to the transportation of materials from the Columbia Falls Reduction Facility to the ARRCOM site during the time period in question.
3. Eight shipments of waste materials were sent to ARRCOM Corporation. For each shipment, items (a), (d) and (e) are listed separately below. Items (b) and (c) are: "ARRCOM Corporation" and "truck", respectively.

(a) Transportation dates and (manifest numbers)  
2-26-81 (1520)  
8-31-81 (9025 001)  
12-08-81 (002)  
03-25-82 (003)  
06-23-82 (004)  
11-08-82 (005)  
11-10-82 (006)  
01-19-83 (007)

(d), (e):

1520 - 610 gallons waste stoddard-type solvent

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- 9025 001 - 600 gallons waste stoddard solvent
- 002 - 400 gallons used crankcase oil, 650 gallons waste stoddard solvent.
- 003 - 1150 gallons used crankcase oil, 350 gallons waste stoddard solvent.
- 004 - 850 gallons used crankcase oil, 650 gallons waste stoddard solvent.
- 005 - 200 gallons used crankcase oil, 1100 gallons waste stoddard solvent.
- 006 - 2224 gallons used crankcase oil, 53 gallons waste stoddard solvent.
- 007 - 1910 gallons used crankcase oil, 350 gallons waste stoddard solvent.

4. See attachments.

5. See attachments.

6. See attachments.

7,8. Kenneth G. Reick, CFAC  
Ray Dwyer, Sampson Lake, Whitefish, Montana  
Gary Fortin, 7 O'Brien Avenue, Whitefish, Montana

9. CFAC does not have any financial statements or other information concerning the Atlantic Richfield Company and its affiliates, CFAC would refer the EPA directly to ARCO for responses to these questions.

10. CFAC is, as stated above, a wholly owned subsidiary of Montana Aluminum Investors Corporation, neither CFAC nor MAIC existed during the transportation period at issue.

11, 12. None

Please note that the information provided above and enclosed is being provided to the EPA with the knowledge and consent of ARCO, the prior owner of the Columbia Falls Aluminum Reduction Facility during the period in question.

In closing, I would reiterate that it is the position of the management of CFAC that, although it did not exist and was therefore not a transporter of materials to the Rathdrum, Idaho facility during the period at issue, CFAC does desire to cooperate as

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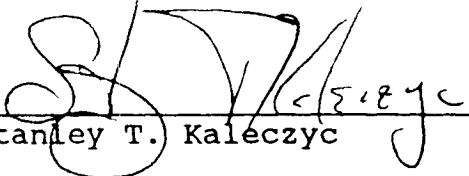
fully as possible with the Environmental Protection Agency in its investigation of this matter. In the event that CFAC locates any additional records related to the transportation of materials during the period from 1969 until January, 1982, it will so advise the Environmental Protection Agency and make copies of these materials available to the EPA. With respect to the copies which are included with this letter, CFAC would be willing to make the original files available to the EPA at the company's offices in Columbia Falls, Montana.

If you have further questions concerning this response, please do not hesitate to contact me directly.

Sincerely,

BROWNING, KALECZYC, BERRY & HOVEN, P.C.

By

  
Stanley T. Kaleczyc

/srg  
Enclosures